



ARCADIS U.S., Inc.
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MEMO

To:
Ed Moreen, USEPA
Jan Olsen, IDEQ

Copies:
Gary Honeyman, UPRR
Bruce Sheppard, BNSF

From:
Rebecca Lindeman, P.E., ARCADIS

Date:
October 22, 2010

ARCADIS Project No.:
CO001429.0001

Subject:
Asbestos Containing Materials End of Ninemile
MM 3.0 to 5.3 – Area 1

PURPOSE

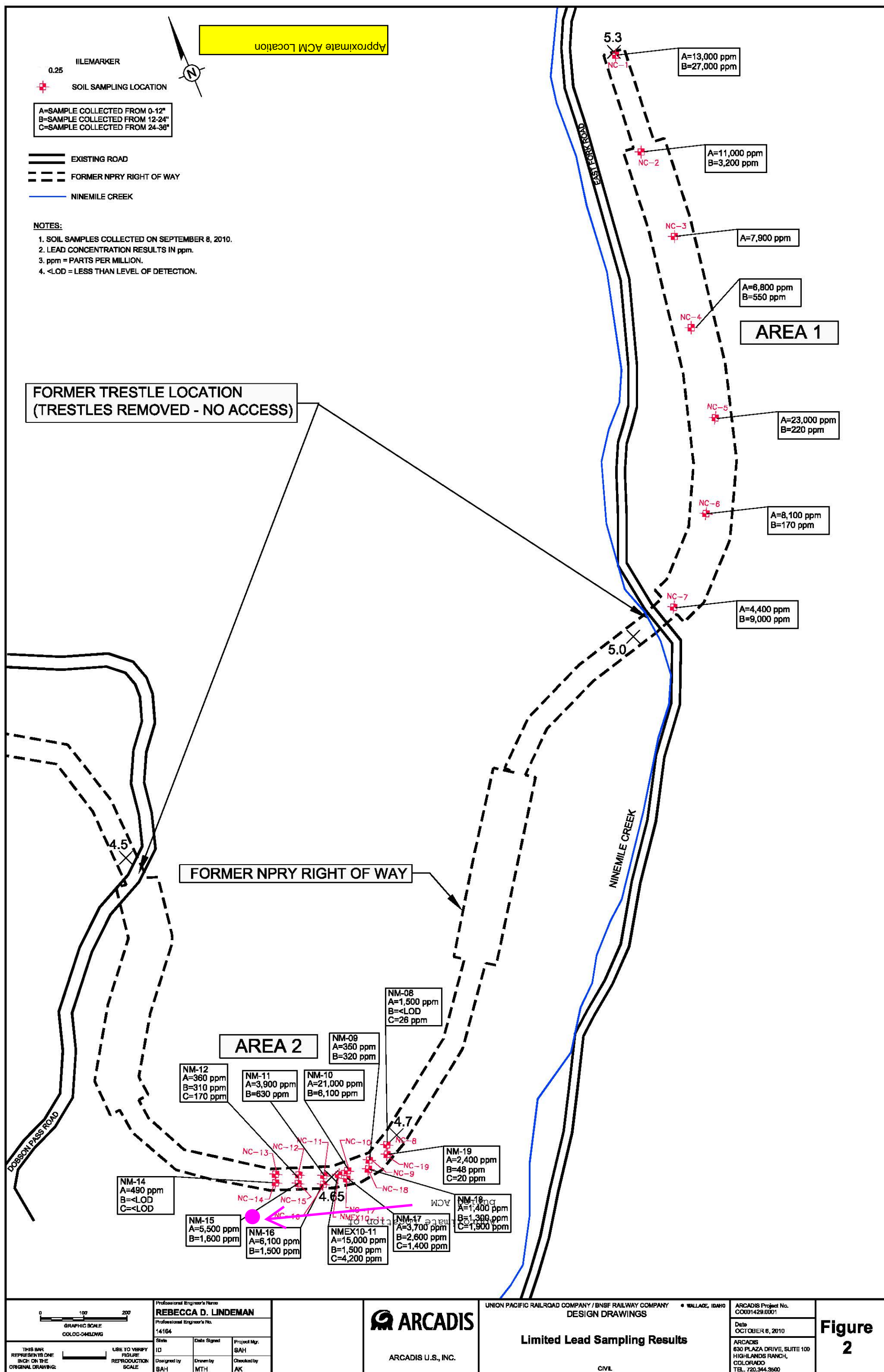
The purpose of this Technical Memorandum is to formally document decisions made by Idaho Department of Environmental Quality (IDEQ) related to asbestos containing materials (ACM) near Area 1 (MM 3.0 to 5.3) at the end of Ninemile, approximately shown on the attached drawing.

Sequence of Events

On October 11, a representative of IDEQ directed a Glacier operator – subcontractor to UPRR and BNSF – to remove debris from outside the work area and bury it within the work area. The work area was designated to be covered with soil and seed as part of the Response Action approved previously by the EPA. The debris material consisted of off-site thin panels, approximately 5 cubic yards in volume. Subsequent to burial of the materials, ARCADIS was made aware of the action and collected a sample of the material for quick-turn analytical for the presence of potential ACM. Lab data indicated the debris material contains approximately 20% by weight transite, indicative of ACM (see attached lab data). ARCADIS notified IDEQ and EPA of the analytical results (verbal communications) and sought direction. Based on conversations between ARCADIS and Rob Hansen of IDEQ, as well as Mr. Hansen and Ed Moreen of EPA, IDEQ recommended that the buried ACM remain in place, under the cover, and be recorded on the as-built record drawings. EPA further requested that remaining ACM off the former railroad embankment be removed and disposed of offsite.

Summary

Buried ACM will be surveyed for location to be recorded on the as-built record drawings. The remaining minimal ACM pieces off the embankment will be gathered, double bagged, labeled and manifested as non-friable ACM, and disposed of at the Graham Road Landfill located in Medical Lake, Washington.



Mountain Laboratories

Division of Mountain Inspection & Laboratory Services, Inc.

9922 East Montgomery Suite 13
Spokane Valley, WA 99206
(509) 922-1365 • Fax (509) 922-1380



NVLAP LAB CODE 101890-0

October 14, 2010

Arcadis
Attn: John Jong
2310 N. Molter Rd. Suite 101
Liberty Lake, WA. 99019

Project: Wallace Yd.

Dear Mr. Jong,

The enclosed report details results for the analysis of the bulk sample(s) submitted to Mountain Laboratories on October 14, 2010. Mountain Laboratories participates in a National Voluntary Laboratory Accreditation Program (NVLAP) for Bulk Asbestos Analysis, governed by the National Institute for Standards and Technology (NIST)-NVLAP I.D. #101890-0. Sample results must not be used by the client to claim endorsement by NVLAP nor any agency of the United States government. Sample analysis was performed to determine asbestos type and content using Polarized Light Microscopy, supplemented by Dispersion Staining (PLM/DS) in accordance with the following methodology:

18/A01 EPA-600/M4-82-020: Interim Method for the Determination of
Asbestos in Bulk Insulation Samples.

This report includes a summary of the analytical results, chain of custody and copies of the analysts report forms used by our analysis. Analytical results are only reflective of the samples, which were tested and presented in this report. Mountain Laboratories limits warranty to proper analysis methods and take no responsibility for sample procurement.

It has been our pleasure providing you with these analytical services. If you have any questions regarding this report, please do not hesitate to call Karen L. Drader or Heidi L. McCarthy at (509) 922-1365.

Sincerely,

A handwritten signature in blue ink that reads "Heidi L. McCarthy".

Heidi L. McCarthy
Laboratory Manager
Mountain Laboratories
Mountain Inspection & Laboratory Services, Inc.

Enclosure: 5819.11575

BULK SAMPLE ANALYSIS FOR ASBESTOS

Arcadis

Attn: John Jong
2310 N. Molter Rd. Suite 101
Liberty Lake, WA. 99019

Project: Wallace Yd.

Method: PLM with Dispersion Staining

Client #: 5819

Laboratory No.	B10-11575		
Sample ID No.	1		
Sample Description	Shingle #1		
Sample Treatment	Teased/Crushed		
Homogeneous	No		
Layered	Yes		
Fibrous	Yes		
Sample Color	Grey		
Asbestos Present	Yes		
Asbestos Type and Percentage 1. Chrysotile 2. Amosite 3. Crocidolite 4. Other	Chrysotile 15-20%		
Total % Asbestos	15-20%		
Other Fibrous Material In Sample			
Non-Fibrous Material:	Other 80-85%		

Date Analyzed: October 14, 2010

Analyzed By: Lisa Meade



Mountain Laboratories, Division of Mountain Inspection & Laboratory Services, Inc. limits warranty to proper analysis methods only and takes no responsibility for sample procurement. Mountain Laboratories, Division of Mountain Inspection & Laboratory Services, Inc. 9922 E. Montgomery, Suite #13, Spokane Washington 99206 (509) 922-1365 - Fax (509) 922-1380. PLM has been known to miss asbestos in a small percentage of samples. Thus negative or <1% PLM results should be tested with either SEM or TEM. Client is responsible for sample separation. This report may only be reproduced in full with written approval by Mountain Laboratories.

Mountain Laboratories

Billing Information:

Contact Name, Address & Phone:

Project Name:

Project No:

Results:

MAIL

FAX

PHONE

509-535-7225

CLIENT:

ArCADis
230 N molter Rd suite 101
liberty lake WA 99019

John Song

ANALYSIS REQUIRED

TURNAROUND

RUSH

Same Day

24 HR

Other:

3-5 Day

SAMPLE #

SAMPLE DESCRIPTION/ID

DATE/TIME

OF CONTAINERS

PLM - BULK

PCM - AIR (NIOSH 7400)

LEAD-AIR, PAINT, WIPE

REMARKS

RESULTS

#	

Shingle #1

10-14-10/14

~~1~~

~~1~~

Chrysotile 15-20% *Appears to be 2 layers

Smegle
10/14/10

RELEASED BY:
(signature)

DELIVERY
METHOD

RECEIVED BY:
(SIGNATURE)

COMPANY / AGENCY OR
AFFILIATION

DATE / TIME
RECEIVED

CONDITION

**Mountain
Laboratories**

10	14	10	12	2
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Good